

# MEMO ENDORSED

Joshua Wurtzel  
Partner

jwurtzel@schlamstone.com  
schlamstone.com

SCHLAM STONE & DOLAN LLP

26 Broadway, New York, NY 10004  
Main: 212 344-5400 Fax: 212 344-7677  
Direct: 212 612-1226 Mobile: 516 528-9944

February 21, 2024

**BY ECF**

The Honorable Edgardo Ramos  
United States District Court  
Southern District of New York  
40 Foley Square, Courtroom 619  
New York, New York 10007

The parties' request for an extension to file their ESI protocol, until March 8, 2024, is granted. SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 2/22/24

New York, New York

Re: *Money Tree Capital Funding, LLC v. Money Tree Capital Markets, LLC, et al.*,  
Case No. 22-cv-10084-ER

Dear Judge Ramos:

This firm represents Plaintiff Money Tree Capital Funding, LLC in this action.

The parties jointly write to request that the Court extend the deadline to file their ESI protocol. That protocol is currently due to be filed on February 23, 2024. The parties have been cooperating to prepare a protocol but believe that a short extension is necessary. The parties have agreed on document custodians and are in the process of collecting potentially relevant documents from those custodians. The parties are also working to identify appropriate search terms to be included in the ESI protocol.

The parties request that the deadline to submit their agreed-upon ESI protocol with custodians and search terms be extended by two weeks until March 8, 2024, with all other discovery deadlines in the case remaining as set forth in the Scheduling Order. This is the parties' second request for such an extension.

Thank you very much for your time and attention to this matter.

Respectfully,

/s/ Joshua Wurtzel

Joshua Wurtzel

cc: All counsel of record (by ECF)